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14 Attorneys for Defendant:
15 QUICKEN LOANS INC.

16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA
18 WESTERN DIVISION

19 AMANDA HILL and GAYLE HYDE,
20 individually and on On Behalf of All
Others Similarly Situated,

21 Plaintiffs,

22 v.

23 QUICKEN LOANS INC.,

24 Defendant.

Case No. 5:19-cv-00163-FMO-SP

**DECLARATION OF W. KYLE
TAYMAN IN SUPPORT OF
QUICKEN LOANS INC.'S
MOTION TO DISMISS
PLAINTIFFS' SECOND
AMENDED COMPLAINT**

Date: March 12, 2020

Time: 10:00 a.m.

Ctrm.: 6-D

Judge: Hon. Fernando M. Olguin

DECLARATION OF W. KYLE TAYMAN

I, W. Kyle Tayman, declare as follows:

1. I am a partner with the law firm Goodwin Procter LLP and a member of the Massachusetts and District of Columbia bars. I have been admitted Pro Hac Vice in the above-captioned matter as counsel for Quicken Loans Inc. (“Quicken Loans”).

2. I submit this Declaration in support of Quicken Loans’ Motion to Dismiss Plaintiffs’ Second Amended Complaint. I make this Declaration based on my personal knowledge and, if called as a witness in this action, I could and would testify competently as to matters set forth herein.

3. Attached hereto as **Exhibit A** is a true and correct copy Plaintiff Gayle Hyde’s Response to Defendant’s Requests for Admission Concerning Personal Jurisdiction, Set One, dated January 3, 2020.

4. Attached hereto as **Exhibit B** is a true and correct copy Plaintiff Gayle Hyde’s Response to Defendant’s Request for Production of Documents Concerning Personal Jurisdiction, Set One, dated January 3, 2020.

5. Attached hereto as **Exhibit C** is a true and correct copy of Quicken Loans Inc.’s Amended Responses to Plaintiff Gayle Hyde’s Interrogatories (Set One), dated November 15, 2019.

6. Attached hereto as **Exhibit D** is a true and correct copy of Quicken Loans Inc.’s Responses to Plaintiff Gayle Hyde’s Interrogatories Concerning Personal Jurisdiction (Set Two), dated January 3, 2020.

7. Attached hereto as **Exhibit E** is a true and correct copy of a May 30, 2019 letter from John A. Vogt, counsel for LowerMyBills.com (“LMB”), to counsel for Gayle Hyde made in further response to Hyde’s subpoena on LMB.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 31, 2020.

/s/ W. Kyle Tayman (with permission)

W. KYLE TAYMAN